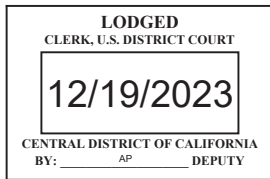


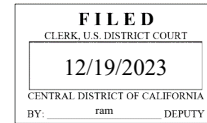
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

## UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

v.

CORTEZ ALEXANDER COOKE,  
KRISTIAN EUGENE CALDWELL,  
ROOSEVELT TERRELL KAHN JR.

Defendant(s)

Case No. 5:23-mj-00564

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 10, 2023 in the county of Riverside in the Central District of California,  
the defendant(s) violated:

*Code Section*  
18 U.S.C. § 1951(a)

*Offense Description*  
Interference with Commerce by Robbery

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

*/s/ Ryan McDuffy*  
Complainant's signature

Ryan McDuffy, Task Force Officer  
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: December 19, 2023

*David T. Bristow*  
Judge's signature

City and state: Riverside, California

Hon. David T. Bristow, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT**

I, Ryan J. McDuffy, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint and arrest warrants against Cortez Alexander COOKE ("COOKE"), Kristian Eugene CALDWELL ("CALDWELL"), and Roosevelt Terrell KAHN JR. ("KAHN") for a violation of 18 U.S.C. § 1951(a): Interference with Commerce by Robbery on or about December 10, 2023.

2. The facts set forth in this affidavit are based upon my observations, my training and experience, and information obtained from various law enforcement personnel and witnesses, including my review of reports prepared by other law enforcement officers and agents. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not purport to set forth all of my knowledge of the investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**II. BACKGROUND OF AFFIANT**

3. I am a Detective with the Brea Police Department ("BPD") and also a federally deputized Task Force Officer ("TFO") presently working with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). As a TFO with the ATF, I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 3051, and I am empowered by law to conduct investigations and make arrests for offenses against the United States.

4. I am currently assigned to the ATF Orange County Violent Crime Task Force ("OCVCTF"). The OCVCTF is comprised of federal and local law enforcement agencies, including, but not limited to, the ATF, Brea Police Department, Santa Ana Police Department, Orange County District Attorney's Office, and Fullerton Police Department. The OCVCTF is responsible for, among other things, investigating violations of federal law involving criminal street gangs, possession of firearms by prohibited persons, possession of stolen firearms, possession of machineguns, the illegal distribution of firearms and narcotics, burglaries, and violent crimes to include robberies. Prior to this assignment with the ATF, I was a Brea Police Officer and have been employed for approximately nine years. During my tenure as a police officer, as well as an ATF TFO, I have conducted and participated in numerous investigations of criminal activity, including, but not limited to, the possession of firearms by prohibited persons, possession of stolen firearms, robberies, and homicides. Since joining the OCVCTF in August of 2018, I have specialized in investigations of robberies and burglaries, firearms violations, drug trafficking, and gang activity. I have participated in the execution of numerous search and arrest warrants related to these investigations.

### **III. SUMMARY OF PROBABLE CAUSE**

5. On December 10, 2023, suspects later identified as COOKE, CALDWELL, and KAHN participated in a smash-and-grab robbery of a jewelry store Temecula, California, in Riverside County. The robbers used hammers to smash open a jewelry case and fled with approximately \$130,000 worth of jewelry. The robbers used two cars: one "lookout" car and one "getaway" car. After fleeing the store,

COOKE and three other suspects got into the getaway car and led officers on a high-speed chase from Riverside County to Compton, California. Officers eventually caught COOKE after he fled from the car near an apartment complex in Compton and led officers on a foot chase. At the time he was arrested, COOKE was wearing the same clothing that investigators observed him wearing during the robbery. Inside the getaway car, officers saw in plain view a trash can containing jewelry display holders and a hammer with broken glass in the backseat. At the scene of the robbery, law enforcement detained the lookout car and arrested CALDWELL (the driver) and KAHN (a passenger). Accordingly, there is probable cause that CALDWELL, KAHN, and COOKE committed a violation of 18 U.S.C. § 1951(a): Interference with Commerce by Robbery on or about December 10, 2023.

#### **IV. STATEMENT OF PROBABLE CAUSE**

##### **A. OCVCTF Investigates a Series of Smash-and-Grab Robberies Across Southern California**

6. I, along with other investigators assigned to the OCVCTF, am investigating a series of smash-and-grab robberies/attempted robberies that target jewelry stores across Southern California. During the course of the investigation, I obtained and reviewed police reports, reviewed surveillance footage and still images from the robberies, conducted surveillance, and discussed the investigation with other law enforcement investigators, among other investigative activities.

7. Based on my review of the above-mentioned sources, I know that during each of the robberies/attempted robberies described below, multiple male subjects wearing hoodies and facemasks, and carrying hammers and trash cans, entered the jewelry stores and attempted to smash display cases and take jewelry. During the

incidents, the suspects almost exclusively used stolen cars bearing stolen California license plates to thwart identification by law enforcement.

**B. OCVCTF Identifies Two Cars Used Across Multiple Robberies/Attempted Robberies<sup>1</sup>**

8. Based on my review of police reports, video surveillance, and license plate reader ("LPR") databases, I am aware that a white Infiniti Q50 sedan bearing California license plate 8CSP963<sup>2</sup> (the "White Infiniti") was a suspect car in the following robberies/attempted robberies:

a. On November 13, 2023, at approximately 2:55 p.m., an attempted robbery at Arbi Jewelers, located at 2795 Cabot Drive, Corona, California;

b. On November 13, 2023, at approximately 3:40 p.m., an attempted robbery at Diamond Direct, located at 908 East Imperial Highway, Brea, California;

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<sup>1</sup> Based on my review of police reports and conversations with other law enforcement investigators, I know that the jewelry stores listed in this affidavit conduct business in interstate commerce through the purchase of jewelry from various sources across the United States. Additionally, these businesses process customer payments utilizing credit cards, which cause these transactions to be processed by various international financial institutions engaged in interstate and international commerce.

<sup>2</sup> Based on my review of police reports, review of footage, and conversations with other law enforcement investigators, the White Infiniti was identified as the suspect car because the Infiniti would pull up to the front door of the jewelry stores, and multiple male subjects would exit the car wearing hoodies and carrying trash cans and hammers. After the robberies, the suspects would return to this car and flee the scene. Additionally, the license plate affixed to this car was issued by the California Department of Motor Cars for another similar Infiniti car. Suspects often "cold plates," or use stolen license plates from other similar cars to mask the identity of the actual car they are using to commit crimes.

c. On November 13, 2023, at approximately 6:00 p.m., a attempted robbery at Don Roberto Jewelers, located at 14715 Rinaldi Street, San Fernando, California;

d. On November 19, 2023, at approximately 1:45 p.m., a robbery at Gemma's Jewelers, located at 12257 Limonite Avenue, Eastvale, California, where the suspects took a total of approximately \$50,000 in stolen merchandise;

e. On December 1, 2023, at approximately 3:55 p.m., an attempted robbery at Mimi's Jewelers Store, located at 18591 Brookhurst Avenue, Fountain Valley, California.

9. Additionally, based on my review of police reports, video surveillance, LPR databases, and conversations with other law enforcement investigators, I am aware that a white Mercedes C300 sedan bearing California license plate 9BBA746 (the "White Mercedes") was used as a "lookout" car. Specifically, during the robberies/attempted robberies, an unmasked black male subject would exit the car and approach the jewelry store, appearing/pretending to be a customer. The subject would then request to enter the store.<sup>3</sup> Once the subject was let inside the store, the subject would hold the door open while multiple subjects wearing hoodies and facemasks, and carrying hammers and trash cans would enter the store. The unmasked subject would then run back to the White Mercedes and enter the passenger side of the car before it left the parking lot of the jewelry store.

10. Based on the review of police reports, video surveillance, and LPR databases, I, along with other OCVCTF investigators,

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<sup>3</sup> Due to security concerns and an increase in jewelry store robberies, many jewelry stores have access-controlled doors in which employees have to buzz in and out customers as they enter and exit.

determined that the White Mercedes was likely used as a "lookout" car for the following robberies/attempted robberies:

a. On October 26, 2023, at approximately 1:41 p.m., a robbery at Tekin Brothers Jewelers, located at 9980 Alabama Street, Redlands, California<sup>4</sup>;

b. On November 13, 2023, at approximately 2:55 p.m., an attempted robbery at Arbi Jewelers, located at 2795 Cabot Drive, Corona, California<sup>5</sup>;

c. On November 13, 2023, at approximately 3:40 p.m., an attempted robbery at Diamond Direct, located at 908 East Imperial Highway, Brea, California<sup>6</sup>;

d. On November 13, 2023, at approximately 6:00 p.m., a robbery at Don Roberto Jewelers, located at 14715 Rinaldi Street, San Fernando, California<sup>7</sup>; and

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<sup>4</sup> Based on my review of LPR data, I am aware that the White Mercedes scanned approximately twenty minutes before the robbery on Alabama Street and Industrial in Redlands, California. This intersection is approximately 0.7 miles from Tekin Jewelers.

<sup>5</sup> Based on my review of LPR data, I am aware that the White Mercedes scanned approximately five minutes prior to the attempted robbery on Temescal Canyon Road and Fashion Drive in Corona, California. This intersection is approximately 0.3 miles from Arbi Jewelers.

<sup>6</sup> Based on my review of video surveillance, I am aware that the White Mercedes entered the parking lot just prior to the attempted robbery. A male subject is seen exiting the White Mercedes and walking to the front doors of the jewelry store. The video does not capture the license plate based on where the car was parked and because the car had no front license plate.

<sup>7</sup> Based on my review of video surveillance, I am aware that the White Mercedes entered the parking lot just prior to the attempted robbery. A male is seen walking from the direction of where the Mercedes White is parked. The video does not capture the license plate based on where the car was parked.

e. On December 1, 2023, at approximately 3:55 p.m., an attempted robbery at Mimi's Jewelers Store, located at 18591 Brookhurst Avenue, Fountain Valley, California<sup>8</sup>.

**C. The White Infiniti and White Mercedes are Used During a Robbery of Diamonds by Monet in Temecula**

11. Based on my review of police reports, conversations with other law enforcement investigators, and my personal involvement in the investigation, I am aware that, on December 10, 2023, at approximately 2:40 p.m., a robbery occurred at Diamonds by Monet in Temecula, California, in Riverside County, within the Central District of California.<sup>9</sup>

12. To conduct further investigation into the string of robberies and based on the similarities in the above-mentioned robberies, I, along with investigators of the OCVCTF, was conducting surveillance of the White Infiniti and the White Mercedes on December 10, 2023.

13. Based on my review of police reports, conversations with other law enforcement investigators, and my involvement in the investigation, I am aware of the following information that occurred on December 10, 2023:

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<sup>8</sup> After the robbery attempt of the jewelry store, a witness saw a male subject running to a White Mercedes that was backed into a parking stall in the parking lot of the jewelry store. The witness obtained a partial license of 9BA\*746 for the car.

<sup>9</sup> Based on my review of reports and conversations with other law enforcement investigators, I am aware that Diamonds by Monet is a retail jeweler that is based in Temecula, California within the Central District of California. The store's inventory consists of rare stones and precious metals sourced from various vendors and locations around the world. Diamonds by Monet makes and receives interstate shipments of their products in the course of business. Additionally, this retailer uses a credit card processor to facilitate the transfer of funds between U.S. and multinational corporations and banks for purchases made by customers at the store.

a. I, along with other OCVCTF investigators, monitored real-time GPS tracker data<sup>10</sup> that showed that the cars together near El Segundo Boulevard and Main Street in Los Angeles, California. Based on the GPS trackers, the cars left the area in tandem and traveled directly to Temecula, California, without stopping. As the vehicles traveled eastbound on the CA-91 freeway in Anaheim, I, along with other OCVCTF investigators, observed the vehicles traveling in tandem and followed them to Temecula. The cars exited on Winchester Road in Temecula and went to a commercial area near Jefferson Avenue and Date Street. A short time later, investigators saw the White Infiniti and White Mercedes enter a shopping center located at 40665 Winchester Road, Temecula, California.<sup>11</sup>

b. TFO David Prewett and other investigators saw the cars drive in front of Diamonds by Monet several times. Based on law enforcements' training and experience, this pattern was consistent with casing the location in advance of a robbery.

c. OCVCTF investigators saw that the White Infiniti was occupied by multiple subjects wearing face masks. Investigators then saw the White Mercedes back into a parking stall on the furthest south aisle in between Diamonds by Monet and Jared Jewelers. I saw a male subject (later identified as CC-1)<sup>12</sup> exit the

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<sup>10</sup> On November 19, 2023, a State of California search warrant was authorized by the Honorable Michele Bell with the Superior Court of California, County of Orange, for a GPS tracker to be installed and monitored for 30 days on the Infiniti sedan. Additionally, on December 1, 2023, a State of California search warrant was authorized by the Honorable Stephen McGreevy with the Superior Court of California, County of Orange, for a GPS tracker to be installed and monitored for 30 days on the Mercedes sedan.

<sup>11</sup> The shopping center contained a Jared Jewelry store and a Diamonds by Monet Jewelry store.

<sup>12</sup> CC-1 was identified by law enforcement as a 16-year-old male from Los Angeles, California.

rear right passenger side of the Mercedes while talking on a cell phone. I observed that CC-1 was a black male with dreadlocks and was wearing a necklace, black shirt, black jeans, and red and white shoes.

d. ATF Special Agent ("SA") Ryan Stearman saw CC-1 walk to the front doors of Diamonds by Monet and enter the store while still talking on the cell phone. CC-1 walked around the store for several seconds.

e. Around this time, investigators saw the White Infiniti back into a parking stall directly in front of the Diamonds by Monet store. SA Stearman saw a male subject in the rear right passenger seat open the door, holding a trash can in his hand.

f. As CC-1 exited the store, investigators saw four suspects in the White Infiniti immediately exit the car and run to the front door of the store. As CC-1 exited the store, he opened the store's door, allowing the suspects carrying hammers and trash cans to enter the store.

g. Based on my review of police reports, conversations with other OCVCTF investigators who witnessed this activity, reviewing surveillance video, and my involvement in the investigation, I am aware that:

i. The subject later identified as COOKE exited the White Infiniti wearing a white and red hoodie, gray pants, white shoes, a white and black face mask, and light-colored gloves while carrying a yellow hammer;

ii. The subject later identified as CC-2<sup>13</sup> exited the White Infiniti wearing a black hoodie, dark jeans, black shoes, dark gloves, and a black face mask while carrying a hammer and a trash bin;

iii. Suspect 3, who also exited the White Infiniti, was described as a male with a thin build, wearing a black hoodie, white shirt, gray sweat pants, white shoes, black gloves, and a black and white ski mask while holding a trash can; and

iv. Suspect 4, who also exited the White Infiniti, was described as male, medium build, wearing a black hoodie, light sweat pants, white socks, black shoes, black gloves and a black face mask while carrying a hammer.

h. TFO Donald Blume saw the suspects enter Diamonds by Monet. Investigators then saw COOKE, CC-2, and Suspect 3 smash the display cases open with hammers and remove the jewelry from the display cases. The suspects placed the jewelry in the trash bins, while Suspect 4 held the door open after CC-1 fled.

i. SA Stearman saw CC-1 run back to the White Mercedes and get into the car. The other suspects, including COOKE, got into the White Infiniti and fled the scene.

14. On December 17, 2023, the store owner advised TFO Dillan Cazares that the total loss resulting from the robbery was approximately \$130,000.00 worth of jewelry.

**D. Law Enforcement Arrest KAHN, CALDWELL, and CC-1 in the White Mercedes**

15. Based on my review of police reports, conversations with other law enforcement agents, and my involvement in the

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<sup>13</sup> CC-2 was identified by law enforcement as a 17-year-old male from Compton, California.

investigation, I am aware that SA Stearman, TFO Prewett, and TFO Richard Crosbie conducted a felony traffic stop on the Mercedes as it attempted to leave the scene. The driver was a man later identified as CALDWELL. The two passengers were CC-1 and a man later identified as KAHN. All three men were arrested. During the arrest, SA Stearman saw that both CALDWELL and KAHN had active, open calls on their cellphones.<sup>14</sup>

**E. Review of KAHN'S Cell Phone Data**

16. Following KAHN'S arrest on December 10, 2023, KAHN provided law enforcement his cell phone number as (310) 259-2590.

17. Based on historical call detail records containing cell site location information, as well as prospective location information,<sup>15</sup> the cell phone number (310) 259-2590 was at or near the following locations during the times of those robberies/attempted robberies:

a. On October 26, 2023, at the robbery at Tekin Brothers Jewelers, located at 9980 Alabama Street, Redlands, California;

b. On November 13, 2023, at the attempted robbery at Arbi Jewelers, located at 2795 Cabot Drive, Corona, California;

c. On November 13, 2023, at the attempted robbery at Diamond Direct, located at 908 East Imperial Highway, Brea, California; and

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<sup>14</sup> I know based on my training and experience working on OCVCTF that suspects involved in robbery crews and conspiracies will actively utilize their cell phones during the commission of the robberies to coordinate the robbery and increase the chances of successfully evading capture.

<sup>15</sup> This data was obtained pursuant to State of California search warrants. The first warrant was authorized on October 31, 2023 by the Honorable Ebrahim Baytieh with the Superior Court of California, County of Orange. The second warrant was authorized on November 29, 2023, by the Honorable Jeremy Dolnick with the Superior Court of California, County of Orange.

d. On November 13, 2023, at the robbery at Don Roberto Jewelers, located at 14715 Rinaldi Street, San Fernando, California.

**F. Law Enforcement Arrest COOKE and CC-2**

18. Based on my review of police reports, conversations with other law enforcement agents, and my involvement in the investigation, I am aware that:

a. OCVCTF investigators followed the White Infiniti after it fled the scene. Investigators saw the car go northbound on the Interstate 15 freeway and travel at a high speed. OCVCTF investigators relayed information to the Riverside County Sheriff's Department ("RCSD") to coordinate additional resources to stop and arrest the occupants of the White Infiniti.

b. As the White Infiniti traveled near Corona, California, RCSD deputies attempted a traffic stop of the car. The car, however, failed to yield and a high-speed chase ensued.

c. Law enforcement helicopters were deployed and saw the car drive through Riverside County, into Orange County, and then eventually into Los Angeles County. The White Infiniti ultimately exited the CA-91 freeway in Compton, California.

d. At that point, law enforcement saw the car go towards the South Bay Villa Apartments ("The Villas"), located at 13111 South San Pedro Street, Los Angeles, California. There, the law enforcement helicopters saw three passengers, one of which was CC-2, flee from the car.

e. California Highway Patrol ("CHP") officers then saw the car drive around the block and enter the gated parking lot for The Villas. There, law enforcement saw COOKE flee from the car. A foot chase ensued, and law enforcement eventually caught COOKE and

arrested him. Law enforcement found CC-2 a short time later, hiding inside an apartment patio located within The Villas.

19. Based on my review of video surveillance footage and conversations with other law enforcement investigators, I know the following:

a. At the time COOKE was arrested, he was wearing the same clothing that investigators saw him wear during the December 10, 2023 robbery.

b. At the time CC-2 was arrested, he was wearing the same pants and shoes that investigators saw him wear during the December 10, 2023 robbery.

c. At the time COOKE and CC-2 were arrested, they lied to law enforcement about their names. Law enforcement later determined their true identities after their arrest and during the booking process.

20. During a search of the White Infiniti<sup>16</sup> -- from which COOKE, CC-2, and the two additional unidentified male subjects fled -- SA Stearman saw in plain view a trash can containing jewelry display holders and a hammer with broken glass in the backseat. He also saw in plain view gloves on the front driver's side and passenger side floorboards.

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<sup>16</sup> Based on my review of reports and conversations with other law enforcement officers, I am aware that the White Infiniti was later determined to be a stolen vehicle as of November 12, 2023.

**V. CONCLUSION**

21. For all the reasons described above, there is probable cause to believe that COOKE, CALDWELL, and KAHN committed a violation of 18 U.S.C. § 1951(a): Interference with Commerce by Robbery on or about December 10, 2023.

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 19th day of  
December, 2023.

  
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HONORABLE DAVID T. BRISTOW  
UNITED STATES MAGISTRATE JUDGE